

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4 ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960

4WD-RPB

JAN 2 9 2004

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Mr. Tom Richardson Corporate EHS Remediation Project Manager International Paper 6400 Poplar Avenue Memphis, Tennessee 38197

SUBJ: RFI Approval

International Paper Treated Wood Products Plant Wiggins, Mississippi EPA I.D. Number MSD 980 600 084

Dear Mr. Richardson:

The Environmental Protection Agency (EPA), Region 4 has reviewed the Final RFI Report dated November 12, 2002 for the above-referenced facility. Based on this review EPA has determined that International Paper has fulfilled the requirements set forth in Condition II.E.3.b. of the Hazardous and Solid Waste Amendments (HSWA) portion of your RCRA permit, effective January 4, 1993 (hereafter referred to as the HSWA permit). In accordance with Condition II.E.3.c. of the HSWA permit, EPA hereby notifies you that no further action is required for those SWMUs associated with the washing, maintenance and fueling of vehicles and equipment (SWMUs 16, 17, 18 and 19) and the Treated Wood Storage Area (AOC A). You are further notified that a Corrective Measures Study (CMS) in accordance with Condition II.G of the HSWA permit, is required for those SWMUs associated with Treatment Areas 1 and 2 (SWMUs 21through 25 and 26 through 29, 32 & 33 respectively) the on-site drainage ditches (SWMU 37) and Church House Branch(AOC B).

In a meeting held in August 2002 between EPA and representatives of International Paper, it was determined that the RFI is complete for the active portions of the facility. It was agreed that the screening level ecological risk assessment (SLERA) was too narrowly scoped with respect to the site drainage ditches (SWMU 37), the forested area between the ditches and Church House Branch and Church House Branch (AOC B). It was further agreed that data gaps in these areas will be addressed in an expanded ecological risk assessment which will be conducted as part of the Corrective Measures Study. As required in Condition II.G.1.a. of the HSWA permit, a CMS Plan shall be submitted within ninety (90) days of receipt of this letter.

Should you have any questions or comments in regard to the requirements contained in your HSWA permit or your obligation to respond to these requirements, please contact Russ McLean of the South Programs Section at (404) 562-8504.

Sincerely,

Narindar M. Kumar, Chief RCRA Programs Branch Waste Management Division

cc: Scott Hodges, MDEQ